

MAB  
7-21-00

United States District Court  
NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA

v.

James Stanley Fuller

 CRIMINAL COMPLAINT

**1:00M 9032**

CASE NUMBER:

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about July 12 to August 7, 2000 in Cuyahoga county, in the Northern District of Ohio defendant(s) did, (check Statutory Language of Offense)

Using any facility of interstate commerce, that is computerized access to the Internet, knowingly attempt to persuade, induce, entice, and coerce an individual who has not attained the age of 18 years to engage in criminal sexual activity ; and did knowingly send child pornography in interstate commerce, via computer.

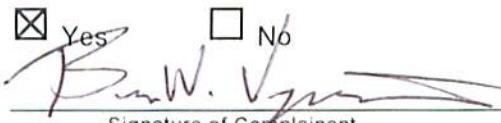
in violation of Title 18 United States Code, Section(s) 2422(b) & 2252(a)(1)

I further state that I am a Special Agent and that this complaint is based on the following facts:  
Official Title

See Attached Affidavit hereby incorporated by reference as if fully restated herein.

Continued on the attached sheet and made a part hereof:

Yes  No

  
Signature of Complainant

Brian W. Vigneaux, Special Agent, FBI Cleveland

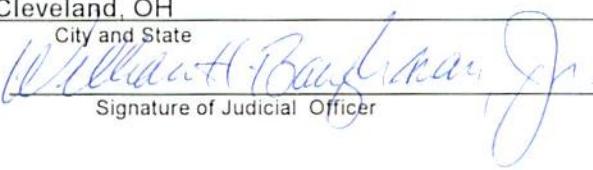
Sworn to before me and subscribed in my presence,

July 20, 2000  
Date

at Cleveland, OH

City and State

William H. Baughman Jr., U.S. Magistrate Judge  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

T:00M 9032

A F F I D A V I T

I, Brian W. Vigneaux, affiant, being duly sworn hereby state the following:

I have been employed as a Special Agent (SA) with the Federal Bureau of Investigation (FBI) for eighteen years. Currently, I am assigned to the Cleveland Division of the FBI. In that capacity, I have investigated Computer Crimes and Sexual Exploitation of Children Crimes. The following information was obtained by affiant and other Special Agents of the FBI as noted:

1. On July 3, 2000, a telephonic complainant whose identity is known to the affiant, advised that she had met Stan Fuller on the Internet using America On-Line (AOL). AOL is a computer service providing Internet access to customers nationwide. AOL customers use a computer that connects to a telephone line to dial a telephone number that provides a connection to AOL computers at Dulles, VA. The complainant advised that Fuller, using the AOL screen name "Blueey0123" contacted her over the computer using a personal chat utility called Instant Messaging (IM). IM is an AOL utility that permits one AOL customer to establish a private chat room with another AOL customer. The IM private chat room displays ongoing communication only between the two screen names in the private IM chat room. The complainant advised that Fuller sent her an IM to begin their relationship. She advised that they communicated for approximately two weeks in June 2000 and then he

gave her the phone number 440-725-1397 to call him. She advised that Fuller told her he was a sports agent and that he had a residence in Georgia but stayed at a hotel in North Olmsted, OH when he was in the Cleveland area handling his client. She advised that her first face to face meeting with Fuller was at a local restaurant where he acted appropriately. She advised that for their second meeting, he drove to her residence in a rental car, and was to take her to dinner. She advised that when he came into her house he took a particular interest in a photograph of her fourteen year old daughter. She stated that she advised Fuller as to her daughter's age and he asked "wouldn't you love to suck her pussy", "have me eat her pussy" and "would you do a threesome?". She advised that she kicked Fuller out of her residence at that time.

2. On July 5, 2000, your affiant was advised by FBI Intelligence Research Specialist Glenn Lovedahl, from the Baltimore FBI Innocent Images Task Force, that Stanley Fuller, Bolingbroke, GA, had an America On-Line account from 11/5/1996 through 10/27/1998 at which time the account was terminated by AOL due to the transfer of graphic files, one of which was named "!!2Pre.jpg" and depicted child pornography. Fuller's screen names at that time included "BlueE71112", "NJones5474" and "April20616".

3. On July 5, 2000, your affiant conducted a public database search and discovered that Stanley Fuller, also known as James

Stanley Fuller, Social Security Number 257-74-2298, Date of Birth 03/12/1949, has the following recent listed addresses:

- a. PO Box 14, Bolingbroke, GA 31004
- b. PO Box 42201, Brookpark, OH 44142
- c. 6940 Forsyth Rd., Macon, GA 31210
- d. PO Box 38, Bolingbroke, GA 31004

4. On July 5, 2000, your affiant conducted a criminal history check on James Stanley Fuller from Bolingbroke, GA. at which time it was revealed that Fuller has FBI# 598044EB6 and was arrested by the Bibb County Sheriff's Office in GA on 4/21/97 charged with Theft by Taking and again on 8/22/97 for Theft by Shoplifting. He received 12 months probation and a \$300 fine in Bibb County State Court. On 2/25/2000 he was arrested by Houston County Sheriff's Office in GA. for driving with license suspended or revoked. He was fined \$130 in Houston County State Court on 3/24/2000. A North Royalton, Ohio Police Incident Report dated 3/31/2000 revealed that a 48 year old woman that had dated Fuller during the prior summer had filed a telephone harassment complaint against Fuller. She advised in the report that she broke up with him after she found out he was married. She discovered this after his wife from Georgia called her unlisted number. She stated that he continued to call her afterward and harass her. Another North Royalton Incident Report dated 4/19/2000 indicated that Fuller threatened bodily harm to the current boyfriend of the above 48 year old woman and had a physical confrontation on the front

lawn of the boyfriend's Strongsville, Ohio residence. In the witness statement made by the woman, she stated that Fuller came to her house on 4/18/2000 and said to her "you better be at my hotel room at 4:00 sharp this afternoon, not a second later. I am going to fuck you one last time and then I will leave you and your friends alone. If you are not there, your friend will incur bodily harm and be hurt by 12:00 noon tomorrow, or sometime thereafter by someone else".

5. On July 12, 2000, AOL responded to an administrative subpoena and advised your affiant that James S. Fuller, utilizing an address of PO Box 42201, Brookpark, OH 44142, has been an AOL member since 2/27/2000 utilizing screen names to include "blueey0123", "april0435" and "k9teacher01".

6. On July 19, 2000, the Brookpark Post Office, 14770 Snow Road, Brookpark, OH revealed that PO Box 42201 was registered to Stanley Fuller, U.S.Hwy 41, PO Box 38, Bolingbroke, GA with telephone number 440-725-1397. Fuller applied for the PO Box on 6/2/99.

7. On July 12, 2000, your affiant, using an undercover screen name, used a computer located at Cleveland, OH, to connect to the Internet via America Online (AOL). Your affiant, herein referred to as UCA, connected to the Internet via AOL on July 12, 2000, at 04:08PM, and entered into an IM chat session with "Blueey0123".

Blueey0123 advised the UCA that he liked younger girls. He was advised that the UCA was "almost 14" in age. He asked the UCA to call him on his mobile phone at 440-725-1397 even though he was in California at that time. He asked the UCA about her measurements and if she was "shaved or hairy". He then asked if she would "love to have that ass..kissed and tongued good". When asked "u tell me whats good for me", he responded "be tied up and blind folded...then make you suck my cock.....while I finger fuck you". He asked "would you like to do your mom?" He advised that he has had sex with several daughters and mothers including a 17 year old girl with her 41 year old mother. He described sexual activity between daughter and mother and was reminded that the UCA was only 13 years old. He then spoke of the UCA masturbating and asked "do you have a nice pink asshole?". He advised that he had to go but asked that she call him tonight when the family has gone to bed. The entire IM chat conversation is contained in Attachment A wherein your affiant's screen name is depicted as UCA.

8. On July 17, 2000, at 01:35PM, your affiant, using the same undercover screen name, herein referred to as UCA, used a computer located at Cleveland, OH, to connect to the Internet via AOL. At 03:13PM, UCA was directly contacted by Blueey0123 via AOL IM. Blueey0123 advised that he was in Westlake, OH, staying at the residence of a professional athlete. He was advised that the UCA had a girlfriend also age 13, at which time he inquired

as to whether they had a sexual relationship together. He inquired about the UCA's prior sexual activity. He suggested meeting later that evening. He suggested taking digital pictures of the UCA. He wanted the UCA to make telephonic contact with him before they met. The entire IM chat conversation is contained in Attachment B.

9. On July 17, 2000, at 05:31PM, your affiant observed and recorded a telephonic conversation between FBI Special Agent Kelly Liberti, acting in an undercover capacity, and James S. Fuller. SA Liberti, herein referred to as UCA2, posed as the thirteen year old girl that blueey0123 asked to call. UCA2 advised Fuller that she would turn 14 next month. When asked his name, Fuller responded that people called him Stan but it was actually James Stanley. He told UCA2 that he was a very wealthy man and owned a sports agency. He asked UCA2 "would you like to meet me tonight". He suggested the possibility of meeting for dinner and afterwards return to the Westlake residence of a professional athlete where they could have privacy until 12:00 - 1:00 AM. He asked UCA2 "do you like me to get down there and lick that little young cunt of yours and lick that little asshole for you". He stated "I'll let you get down there and suck my cock and lick my balls, I got a pretty nice long dick, I got a nine inch cock". Fuller advised UCA2 "I can fuck you all night long non-stop. UCA2 suggested that her girlfriend Nikki come along and Fuller agreed but later said "if Nikki come along how are you

going to fuck me tonight". The entire conversation of the telephone call is contained in the transcript as Attachment C.

10. On July 19, 2000 your affiant, using the same undercover screen name, herein referred to as UCA, used a computer located at Cleveland, OH, to connect to the Internet via AOL. At 02:41PM, UCA was directly contacted by Blueey0123. Blueey0123 advised that he wanted to meet today. He suggested picking the UCA up in his car and bringing UCA to a place in Westlake. The UCA advised that she would try to call Blueey0123 in thirty minutes. The entire IM chat conversation is contained in Attachment D.

11. On July 19, 2000, at 03:49 PM, your affiant observed and recorded a telephonic conversation between FBI Special Agent Kelly Liberti, acting in an undercover capacity and James S. Fuller. SA Liberti, herein referred to as UCA2, posed as the thirteen year old girl that blueey0123 asked to call. Fuller and UCA2 discussed meeting at Westgate mall on the following afternoon between 1:30 PM and 2:00 PM. Fuller advised UCA2 that he could meet her on the street and pick her up with her bicycle because he was driving a "Jimmy" vehicle. He advised that no one would be at his place tomorrow at that time. He asked "would you like to fuck me?". Fuller advised UCA2 that he owns six computers, including Toshiba's and IBM's. Fuller asked UCA2 how old her mother was, if she was dating, if she was attractive and

if she talked to her about anything sexual. He asked UCA2 "would you like to have sex with your mother you think". He advised UCA2 that "a lot of girls have sex with their mothers". Fuller told UCA2 that "I'll give you the best fuck you've ever had in your life". He told UCA2 that "I'll get down there and lick that pussy". He asked "would you like to fuck two guys at one time". He told UCA2 that "there are women that fuck dogs" and "there is no man on green earth that can fuck you the way a dog can". He told UCA2 that "if you want to try to fuck a dog I'll get you a dog". He advised UCA2 that he had pictures of dogs fucking and said that he would send her a picture over the Internet. He described how a dog has sex with a woman. He advised that he had all kinds of pictures including "dogs fucking women" and "girls licking pussy". He asked UCA2 if she would "like to lick on another pussy". He advised that he could arrange for another woman for UCA2. Fuller advised that he could buy UCA2 some vibrators and dildos and bring them to their meeting tomorrow, and then she could take them home. Regarding their meeting, he asked "you think you going to want to fuck me" and "are you going to want to come back here to my place where I'm staying or you don't want to". UCA2 agreed to call Fuller as soon as her mother leaves for work at approximately 12:30 PM on the following day. They agreed to meet at Westgate mall between 1:30 and 2:00 PM at the mall. Fuller tried to convince UCA2 to have him pick her up at a street corner but UCA2 preferred to ride her bicycle to the mall. Fuller asked "so we going to meet tomorrow then, is that a fact, or is

that just fantasy". He advised that he would send her a picture of a dog in a few minutes. He wanted UCA2 to get on the computer in the evening and chat with him. The entire conversation of the telephone call is contained in the transcript as Attachment E.

12. On July 19, 2000, at 05:50PM, your affiant, using the same undercover screen name, herein referred to as UCA, used a computer located at Cleveland, OH, to connect to the Internet via AOL. UCA retrieved an email message sent from Blueey0123 on 7/19/00 at 4:54 PM. This email message contained two pornographic photos of women having sex with dogs.

13. On July 20, 2000, your affiant, using the same undercover screen name, herein referred to as UCA, used a computer located at Cleveland, OH, to connect to the Internet via AOL. At 10:23 AM, UCA was directly contacted by K9Teacher01 (another screen name of Fuller). Fuller and UCA discussed the photo he sent of a dog having sex with a woman the prior evening and other pornographic photos he sent to the UCA that morning. Fuller told UCA that the one pornographic photo was of a 13 year old girl. They discussed some of the specifics as to a meeting Fuller intended to have that afternoon with the UCA at 12:30 PM. The entire IM chat conversation is contained in Attachment F.

14. On July 20, 2000, at 12:08 PM, your affiant observed and

recorded a telephonic conversation between FBI Special Agent Kelly Liberti, acting in an undercover capacity and James S. Fuller. SA Liberti, herein referred to as UCA2, posed as the 13 year old girl that Fuller asked to call. Fuller and UCA2 discussed meeting at a marina located on the Rocky River at the Western end of Lakewood, OH, just South of Detroit Road, at approximately 12:30 PM.. Fuller advised UCA2 that he would be driving a white GMC Jimmy. Fuller asked UCA2 her age and UCA2 responded "almost 14". Fuller replied "14 going on 18?" Fuller stated "you're 21 as far as I'm concerned".

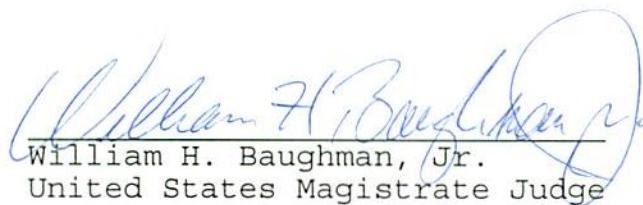
15. On July 20, 2000, at approximately 12:30 PM, FBI Agents from the Cleveland field office advised your affiant that they observed Fuller driving a white GMC Jimmy bearing Georgia registration 45RC2 registered to Anita K. Fuller of 8129 Rivoli, Macon, GA. Fuller entered a parking lot near the marina on the Rocky River just South of Detroit Road in Lakewood, OH. Fuller parked near the water. Fuller then proceeded to drive in circles in the "horse shoe turn around area" near the marina. Fuller was arrested at approximately 12:45 PM by FBI Agents as he approached the exit.

16. Based on the facts as stated above, there is probable cause to believe that James S. Fuller, with intent to engage in criminal sexual activity with a minor, did knowingly use facilities and means of interstate commerce, that is computerized access to the Internet and telephones, to attempt to entice a 13 year old female to meet Fuller for such activity, in violation of Title 18, United States Code, Sections 2422(b); and there is probable cause to believe that James Stanley Fuller did knowingly send child pornography in interstate commerce via computer, in violation of Title 18, United States Code, Sections 2252(a)(1).



Brian W. Vigneaux, Special Agent  
Federal Bureau of Investigation

Sworn and subscribed before me this 21st day of July, 2000.



William H. Baughman, Jr.  
United States Magistrate Judge